

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RONALD BETHUNE, on behalf of himself and
all others similarly situated,

Plaintiff,

-against-

LENDINGCLUB CORPORATION,
WEBBANK, STEEL PARTNERS
HOLDINGS, L.P., THE LENDING CLUB
MEMBERS TRUST, and DOES 1 through
10, inclusive,

Defendants.

Case No. 1:16-cv-02578 (NRB)

**DEFENDANTS LENDINGCLUB CORPORATION AND THE LENDING CLUB
MEMBERS TRUST'S MOTION TO COMPEL ARBITRATION**

PLEASE TAKE NOTICE that Defendants LendingClub Corporation and The Lending Club Members Trust (together, "LendingClub"), by and through its undersigned counsel, hereby move the Court, as soon as counsel may be heard, for an order compelling arbitration on an individual basis of the claims asserted in Plaintiff's Complaint and staying this action pending the completion of arbitration. LendingClub so moves upon Defendants' Joint Brief in Support of Motions to Compel Arbitration and to Stay Action, the accompanying Declarations of Jason Altieri and Benjamin R. Nagin, and the exhibit annexed thereto, and the letter of Benjamin R. Nagin, submitted today on behalf of all defendants in this action.

Dated: New York, New York
June 17, 2016

/s/ Mark P. Ladner
Mark P. Ladner
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Corporation and The Lending Club Members
Trust*